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Attorneys for Defendant
PRECISION VALVE & AUTOMATION, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ an individual and ISELA
HERNANDEZ, an individual,

Plaintiffs,

v.

PRECISION VALVE & AUTOMATION,
INC., a corporation and DOES 1-20,

Defendants.

) CASE NO. 2:17-cv-03342 ODS (GJS)

)
) **FURTHER RESPONSE TO ORDER**
) **TO SHOW CAUSE DATED**
) **FEBRUARY 4, 2019 (ECF No. 86)**

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1 TO THE HONORABLE COURT:

2 Defendant provides the following FURTHER response to this Court's Order To Show
3 Cause dated February 4, 2019. This FURTHER response is given in view of this Court's
4 continued OSC hearing.

- 5 1. As noted previously, the parties signed a binding settlement agreement at a
6 mediation held on January 3, 2019. Ruben Juarez, Isela Hernandez and their
7 attorney, Daniel Balaban, and Defendants' attorney, Alex P. Catalona, signed this
8 agreement.
- 9 2. A redacted version of this agreement was previously provided to the Court.
- 10 3. The formal settlement paperwork was recently revised on May 8, 2019 based on
11 considerations of plaintiff Ruben Juarez's workers' compensation attorneys given
12 pending settlement discussions in that case.
- 13 4. Plaintiffs' attorneys have been provided with the revised final versions of the
14 settlement documents but have not obtained the signatures from plaintiffs Ruben
15 Juarez and Isela Hernandez. To date, the signed agreement has not been provided to
16 defense counsel.
- 17 5. Defendant requests that the Court permit the parties an additional one hundred
18 twenty (120) days to file a stipulation of dismissal in this Court or work to enforce
19 the settlement.

20 Respectfully submitted,

21 Dated: June 26, 2019

22 BECHERER KANNETT & SCHWEITZER

23 By: /s/ Shahrads Milanfar
24 Shahrads Milanfar
25 Alex P. Catalona
26 Attorneys for Defendant
27 PRECISION VALVE & AUTOMATION, INC.
28

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 PRECISION VALVE & AUTOMATION, INC.

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ an individual and ISELA)	CASE NO. 2:17-cv-03342 ODW (GJS)
HERNANDEZ, an individual,)	
)	[Los Angeles County Superior Court
Plaintiffs,)	Case No. BC650229]
)	
v.)	CERTIFICATE OF SERVICE
)	
PRECISION VALVE & AUTOMATION,)	
INC., a corporation and DOES 1-20,)	
)	
Defendants.)	

I, Jerry M. Dumlao, declare that I am employed in the County of Alameda, State of California; I am over the age of eighteen (18) years and not a party to the within entitled action; my business address is 1255 Powell Street, Emeryville, California 94608.

On **March 26, 2019**, I caused to be served the foregoing:

RESPONSE TO ORDER TO SHOW CAUSE DATED FEBRUARY 4, 2019 (ECF No. 86)

In said action by placing a true copy thereof enclosed in a sealed envelope and served in the manner and/or manners described below to each of the parties herein and addressed as follows:

Attorneys for Plaintiff

Teresa Li, Esq.
 LAW OFFICES OF TERESA LI, PC
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Attorneys for Plaintiff

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☒ (By Mail) I deposited such envelope with postage thereon fully prepaid to be placed in the United States Mail at Emeryville, California. I am familiar with the mail collection practices of Becherer Kannett & Schweitzer Attorneys and pursuant to those practices the envelope would be deposited with the United States Postal Service the same day.

☐ (By Personal Delivery) I caused such envelope to be delivered by hand to the office of the addressee(s).

☐ (Via Facsimile) I caused said document(s) to be transmitted to the facsimile number(s) of the addressee(s) designated.

☐ (Via Electronic Mail) I caused said document(s) to be I caused said document(s) to be transmitted to the addressee(s).

☒ **(Electronic Filing)** I am familiar with the United States District Court, Eastern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document.

Executed on June 26, 2019.



Jerry M. Dumlao

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